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July 6, 2011

**Via Electronic Case Filing System**

Honorable Sandra L. Townes  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Moran Towing Corporation v. American Stevedoring Inc., et al.*  
E.D.N.Y. Docket No. 11 Civ. 2636 (SLT)  
Our Ref.: 660736-00606

Dear Judge Townes:

We represent Plaintiff Moran Towing Corporation ("Moran") in the above captioned action. We write to advise the Court of the current status of the Barge NEW YORK, which is the subject of an arrest order issued by the Court on July 5, 2011.

As of this morning the Barge NEW YORK was located in the District at the terminal at Red Hook. Some time after the Court's arrest order was docketed, but before the United States Marshal was able to serve the warrant of arrest, Defendant American Stevedoring Inc. ("ASI") had the barge towed from Red Hook, by another towing company. It has not yet returned to the District. This action is a direct attempt to thwart the Court's order of arrest and is in direct violation of ASI's counsel's representation in his letter to the Court of July 5, 2011 that the Barge NEW YORK would remain "situated in the District" while the Court considers ASI's motion to vacate the arrest.

Moran hereby requests that the Court issue an order of contempt against ASI requiring it to return the Barge NEW YORK to Red Hook forthwith so it may be served with the process duly issued by this Court and that ASI and its counsel be jointly and severally fined an appropriate hourly amount until the barge is returned and arrested.

Respectfully submitted,

/s/ *Richard V. Singleton*

Richard V. Singleton

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